RAC Program Stakeholder Engagement

Meeting

Colorado Department of Health Care Policy & Financing February 1, 2024



Panelists

Bart H. Armstrong, Esq.

Fraud, Waste, and Abuse (FWA) Division Director, HCPF

Alyssa M. Gilger

Recovery Audit Contract (RAC) Section Manager, HCPF

Prismar N. Perez

Contract Audit Operations (CAO) Unit Supervisor, HCPF

Meghan Morhauser

Recovery Audit Contract (RAC) External Communications Liaison, HCPF

Lydia Clark

Contingency-Based Contract Manager and Fiscal Specialist, HCPF

Chantal Kalisch

Colorado RAC Senior Program Manager, HMS

Agenda

- Recap: November 2023 Meeting
- HB23-1295 RAC Provider Advisory Board
- The Role of the Medicaid RAC
- Payments to HCPF for RAC Findings
- HMS Colorado RAC Provider Portal
- Colorado RAC Transparency Projects
- Upcoming Training Opportunities
- Q & A



Recap from the Previous Meeting

Presented by: Bart Armstrong, HCPF

November 2023 Recap: Comments and Questions

<u>Inpatient Rebilling Pilot Program Status: In Progress</u>

- Inpatient rebilling is taking place (manually claim by claim)
- Permanent solution tentatively slated for July 2024
 - ☐ Rebilling is only related to inpatient/outpatient claim conversions
 - ☐ All other claims are reduced/repriced according to the payment methodology

Provider Comments and Questions:

- Any questions related to specific cases have been resolved
- Cases in appeal have to be addressed in the correct forum
- Specific audit updates will be communicated via all of the following methods:
 - Letters to providers
 - Email blasts
 - On our website
 - ☐ In stakeholder meetings, once all specific details have been addressed

Other items, suggestions and related questions from the November 2023 meeting are being covered today



November 2023 Recap: OSA Audit and HB23-1295 Details

OSA Audit Status: In Progress

- OSA has visibility of the timelines and oversight of the contract with BerryDunn
- HCPF does not have a definitive date when this audit will be concluded

HB23-1295 Main Changes for HCPF/RAC

- Reporting on the HCPF RAC website of audit activity
- Quarterly Stakeholder Engagement meetings
- Quarterly Provider Advisory Board meetings
- Quarterly RAC training
- Publishing of RAC contract & oversight information
- OSA Audit of the Medicaid RAC Program

House bill <u>HB 23-1295</u> is posted on our website for reference



HB23-1295 RAC Provider Advisory Board

Presented by: Meghan Morhauser, HCPF

HB23-1295 RAC Provider Advisory Board Members

Metro & Rural Hospital Members

- Dr. Derek Braun, MD, Banner Health
- Shana Steckler, Denver Health
- Kathryn A. Zeller, UCHealth
- Michelle Gay, San Luis Valley (SLV) Health

<u>Durable Medical Equipment Member</u>

Jennifer Wilmington, Columbine Medical Equipment

Independent Provider

Barbara Quissell, MD, Retired, Neonatal experience

Home Health, LTC, SNF, HCBS & Hospice Members

- Kristin Wildrop, Nursing & Therapy Services of Colorado, Inc.
- Jan Arnott, RN, Home Health & Hospice

Radiology Members:

We have an open seat

Further information to come



HB23-1295 RAC Provider Advisory Board Members

HCPF Board Members

- Prismar Perez, Contractor Audit Operations Unit Supervisor (RAC)
- Alex Weichselbaum, Primary & Ancillary Care Section Manager (Policy)

HMS Board Member

Chantal Kalisch, HMS Colorado RAC Program Manager

Attendees may include other representatives as needed or requested by the board



HB23-1295 RAC Provider Advisory Board Meetings for 2024



- Quarter 1- Thursday, March 14, 2024
 1pm-4pm
- Quarter 2- Thursday, June 27, 2024

 1pm-4pm
- Quarter 3- Thursday, August 22,
 2024 1pm-4pm
- Quarter 4- Thursday, December 12, 2024 8am-11am

Topics discussed at the RAC Provider Advisory Board meetings will be addressed in these quarterly stakeholder meetings



The Role of the Medicaid RAC

Presented by: Alyssa Gilger, HCPF

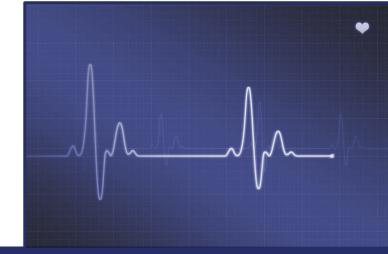
Our role: Medicaid Program Integrity

What we do for Program Integrity:

- RAC is the Program Integrity resource to identify the "Waste" part of Fraud, Waste and Abuse
- RAC conducts post-payment reviews of medical paid claims to correct past overpayments or past underpayments
- RAC helps to identify system errors, billing issues or trends to help other areas of HCPF to close the loop on future overpayment issues

What we do not do for Program Integrity:

- Fraud Investigations
 - ☐ If Fraud or Abuse are suspected, it is referred to the appropriate agency
 - ☐ If you suspect or want to report fraud please go to: https://hcpf.colorado.gov/fraud-waste-and-abuse



Authority: 42 CFR 455.502





Our role: RAC Program and Audits Education

What we do for Provider Education:

- Conduct RAC audit training to ensure providers know about
 - ☐ Timelines of an audit
 - ☐ Exit conference expectations (complex audits)
 - Provider rights and responsibilities
 - ☐ HCPF and HMS rights and responsibilities
 - ☐ Who to contact for issues, updates or for more information
 - Utilizing the HMS Colorado RAC Provider Portal
- Provide rules, resources and regulations, historically
- Publish RAC training materials, infographics, FAQs and policy memos, as needed

What we do not do for Provider Education:

- Claims processing training for current provider billing issues
- Provide guidance for current benefits and policy clarifications

Authority: 42 CFR 455.508(d)



Our role: Customer Service

What we do for Customer Service:

- HMS Provider Services (M-F 8:00 a.m. to 5 p.m. Mountain Time): (877) 640-3419
- HMS Provider Services email: <u>CORAC@hms.com</u>

Provider Services Include:

- ☐ HMS Colorado RAC Provider Portal issues, questions or help
- Exit Conference Scheduling
- ☐ HMS Colorado RAC Provider Portal access to review and upload documents
- ☐ Answer questions related to claims review status

What HCPF cannot do for Customer Service:

- Work outside the audit process
 - Claims or case specific issues emailed to HCPF will be forwarded to HMS
 - ☐ HCPF cannot answer case or claim specific questions without causing significant delays
 - ☐ HCPF does have reporting and oversight of all HMS provider service activities



Our role: The Auditor



What HMS's Role is:

- Intake and review of medical records
- Clinical claims reviews
- Automated and medical coding claims reviews
- Applying rules, laws and regulations specific to each audit
- Identify historical claims billing problems to correct the payments to providers

What HCPF's Role is:

- Approve each and every notice that is sent to providers
- Oversight of the daily operations
- Coordination of audits
- Payments
- Communicating RAC specific information
- Contract oversight



HCPF Provider Resources: Non-RAC Roles

Medicaid claims billing training:

- HCPF claims billing training
- Provider quick guides

Claims denials, client eligibility, provider enrollment and billing questions:

• Gainwell Provider Services (Not HMS): 1-844-235-2387 (M-F 7:00 a.m. - 5:00 p.m.)

Policy and Benefits Clarifications:

- Provider Billing Manuals
- Provider Bulletins
 - □ Policy/Program Staff are listed in the billing manuals and bulletins (online)

Help from HCPF Provider Field Representatives:

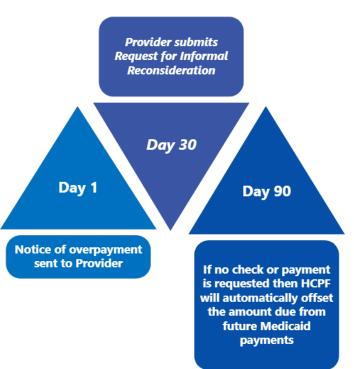
- Technical assistance for the Provider Web Portal
- Provider enrollment
- Billing and claims
- Electronic Data Interchange
- Understanding and reconciling the remittance advice



Payments to HCPF for RAC Findings

Presented by: Lydia Clark, HCPF

Audit and Payment Timeline without Informal Reconsideration or Appeal



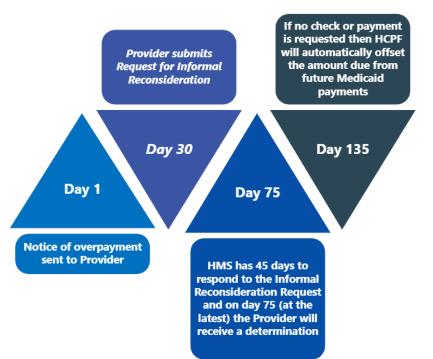
- If a provider does not request an informal reconsideration or file an appeal, payment is due on day 90
- If a payment plan request, offset request or check is not received by day 90, HCPF will automatically offset the amount due from future Medicaid payments

Authority: 10 CCR 2505-10, Section 8.076.3. "Recovery of Overpayments"



Audit, Informal Reconsideration & Payment

Timeline



- If a provider intends on submitting an informal reconsideration (IR) request to HMS, the payment is due to HCPF by day 135
- If a payment plan request, offset request or check is not received by day 135, HCPF will automatically offset the amount due from future Medicaid payments

Authority: 10 CCR 2505-10, Section 8.076.3. "Recovery of Overpayments"

Payments made by Check to HCPF

Please make sure all RAC related checks are mailed to the address on the demand letter:

HCPF PICO

PO Box 5143

Denver, CO 80217

- Checks that are mailed in more than 60 days past the due date run the risk of a duplicate recoupment because an offset has already occurred
- If a late check may be mailed in, please contact hcpf_corachcpf@state.co.us to see if an offset has already been set up for the case

Necessary Information Needed for Sending in Payments

To ensure that checks are applied appropriately, it is necessary to include:

- 1. The original demand letter
- 2. The RAC case number on the comment/memo section of the check

Checks without this result in:

- Lack of closing your case file & reporting of outstanding balance
- Erroneous recoupments

HCPF and HMS are working on functionality within the HMS Provider Portal to give providers better tools to reconcile RAC related recoupments

More to come in the upcoming months



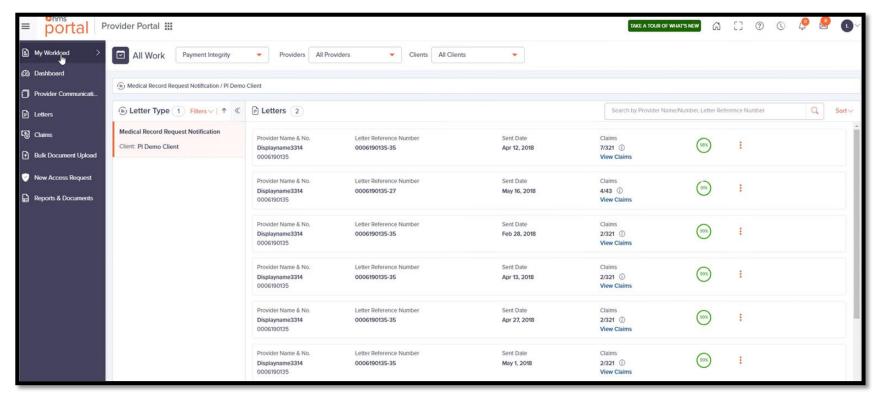
HMS Colorado RAC Provider Portal

Presented by: Chantal Kalisch, HMS



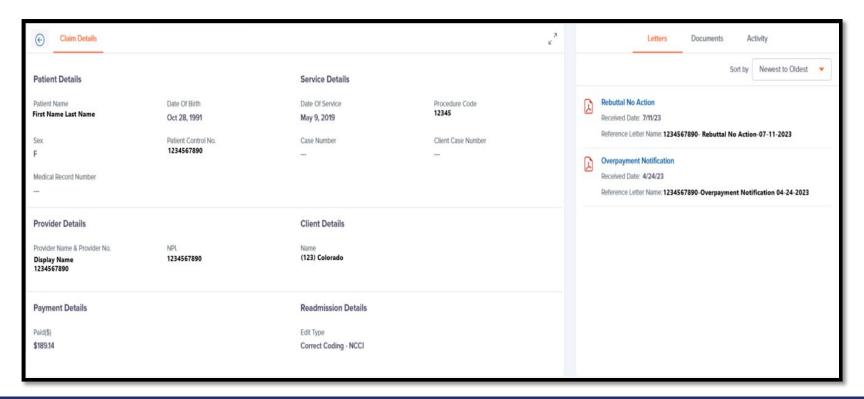
HMS Provider Portal: My Workload

View all claims that are waiting for your response



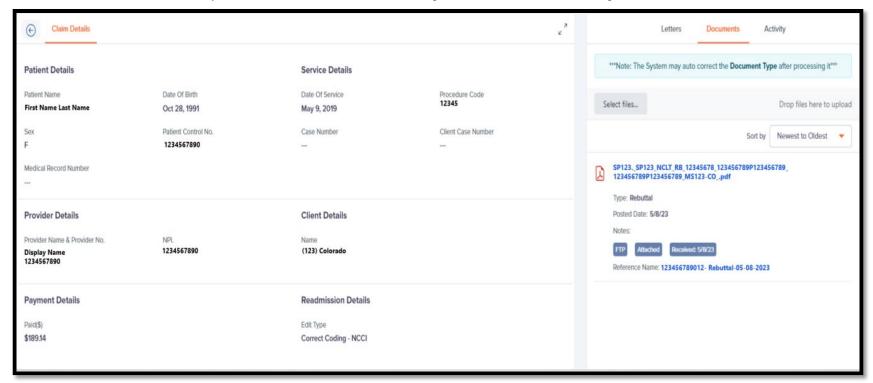
View a Specific Claim

Select a claim and it will reference the specific details, as well as show you any letters for that claim



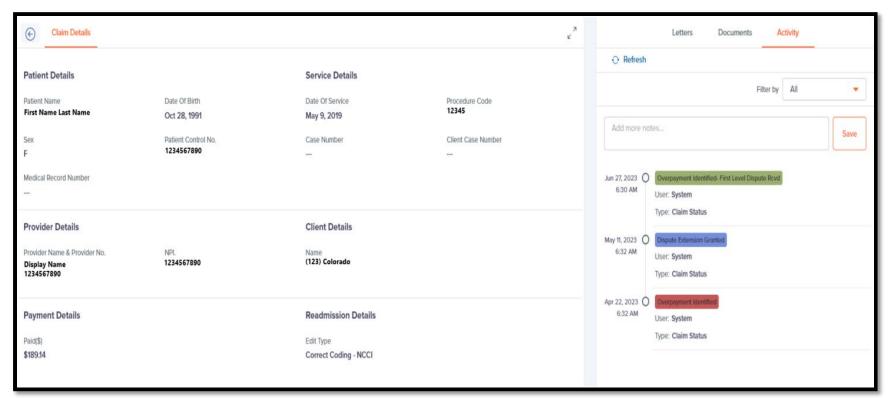
Attach and View Documents

Attach documents to the specific claim and view any documents already attached



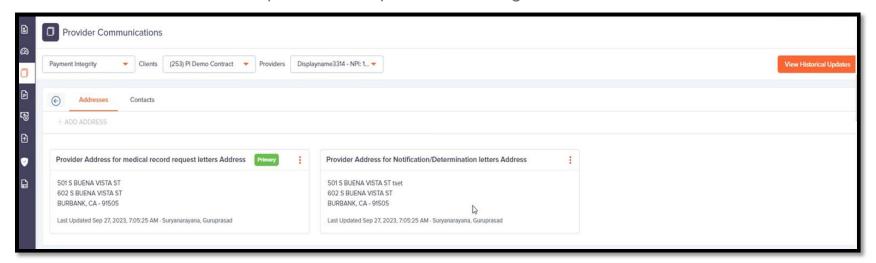
Claims Activity

View the current status of the claim



Update Address Information

Addresses and Contact- Allows providers to update the mailing and contact information +ADD ADDRESS

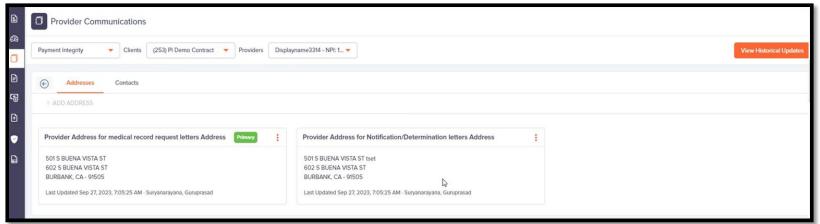


- Updating Addresses When updating the addresses, providers should only utilize 2 Address Types:
 - Provider Address for medical record request letters Address- All medical record requests will be mailed to the address provided under this Address Type
 - Provider Address for Notification/Determination letters Address- All notifications such as findings and appeal determinations will be mailed to the address provided under this Address Type



Update Contact Information

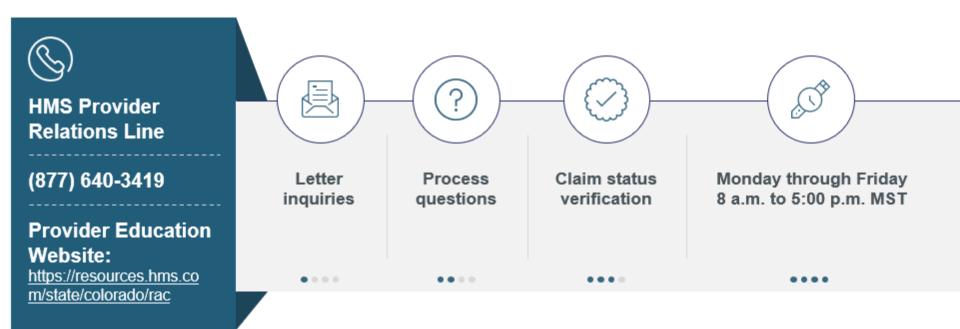
Contacts- Allows providers to update the Contact information by using + ADD



- Updating Contacts- The contact information will be used by the Provider Relations Team when they are doing their courtesy call outs. Providers should only utilize 2 Contact Types:
 - Provider Contact for medical record request letters Contact- All medical record requests will be mailed to the address provided under this Address Type
 - Provider Contact for Notification/Determination letters Contact- All notifications such as findings and appeal determinations will be mailed to the address provided under this Contact Type



Provider Support



Colorado RAC Transparency Projects

Presented by: Prismar Perez, HCPF

Colorado RAC HCPF Communications Updates

Colorado RAC Clarifications and Suggestions Box

- Dedicated RAC HCPF Communications Liaison will monitor
- Automated received response for providers
- Automated status response and next steps for providers

HCPF RAC emails, queued worklists and forms for:

- Payment requests and details
- Escalations
- General questions/inquiries



Our goal is to have swifter and more transparent communications from the RAC HCPF team for providers



Colorado RAC Educational Resources Updates

Infographics, Memos and Audit topics including:

- Audit findings and trends
- Explanations and history
- Audit timelines and expectations
- RAC topics and roles
- Common questions or clarifications from providers

Website Updates:

- Updated clickable content tables for ease of use
- Addition of:
 - More resources from HCPF
 - More reporting
 - ☐ Published tiers and limits (provider specific)
 - All the resources located on the HMS Colorado RAC website



Colorado RAC Dynamic Auditing

Similar to Medicare, RAC Additional Documentation Requests (ADR), HCPF and HMS are working to create the methodology for Dynamic Auditing



What this means for billing providers:

- If the trends of audit findings decrease, RAC will lower claims limits
- If the trends of audit findings increase, RAC will add to the claims limits
- Tiers and limits will be updated and published each state fiscal year (July 1st-June 30th)

Each of these updates and enhancements will be announced via email blasts, in stakeholder engagement meetings and published on our website

Colorado RAC Claims Adjustments

Coming in 2024-2025:

- Claims in a RAC audit will be locked unless approved for rebilling or repricing
- Claims specific audit tracking
- Adjustments from a RAC audit will be shown on remittance specific to the claim and patient



Our Goal:

Help providers and billers to identify claims in audits, adjustments and recoupments saving everyone time



Upcoming Training Opportunities

Presented by: Meghan Morhauser, HCPF

Upcoming Colorado RAC Stakeholder Meetings

RAC Stakeholder Meetings

- Thursday, May 2, 2024 12pm-1pm MST
- Thursday, August 1, 2024 12pm-1pm MST
- Wednesday, November 13, 2024 12pm-1pm
 MST
- Wednesday, February 12, 2025 12pm-1pm MST
- Wednesday, May 14, 2025 12pm-1pm MST
- Wednesday, August 13, 2025 12pm-1pm MST







Upcoming February 2024 HMS Colorado RAC Training

Colorado Complex RAC Audits currently include:

- Inpatient RAC Audits
- Physician Administered Drugs and Enterals RAC Audits

When: Tuesday, February 20, 2024 2pm-3pm MST, Register Today

HMS Colorado RAC 101: Complex Audit training includes:

- Timelines of a complex audit
- Exit conference expectations
- Provider rights and responsibilities
- Utilizing the HMS Colorado RAC Provider Portal (not InterChange)
- Who to contact for issues, updates or for more information



Colorado Provider Training Opportunities

HMS Colorado RAC Training:

Complex Colorado RAC Audit Training

- Tuesday, February 20, 2024 2pm-3pm MST
- Wednesday May 15, 2024 11am-12pm MST

Complex Hospice Colorado RAC Audit Training

- Thursday, March 13, 2024 1pm-2pm MST
- Tuesday, June 18, 2024 2pm-3pm MST

Automated Colorado RAC Audit Training

Tuesday, April 16, 2024 10am-11am MST

HMS RAC trainings are scheduled monthly and always available online at your convenience on the <u>HMS</u>

<u>Colorado RAC Website</u>

HCPF Provider Billing Training:

Professional Claims (CMS 1500)

 Thursday, February 8, 2024 9:00am-11:30am MST

Institutional Claims (UB-04)

Thursday, February 22, 2024
 9:00am-11:30am MST

Provider Billing Training is scheduled monthly and registration and information can be found on the HCPF Provider Resources webpage

